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August 3, 2015

BY ECF AND HAND DELIVERY

The Honorable Shira A. Scheindlin
United States District Judge
United States District Court for the
Southern District of New York
500 Pearl Street
Courtroom 15C
New York, NY 10007-1312

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Re: *BOKF, N.A. v. Caesars Entertainment Corporation*, Case No. 1:15-cv-01561-SAS (the “BOKF Action”)

***Frederick Barton Danner v. Caesars Entertainment Corporation, et al.*, Case No. 1:14-cv-7973-SAS (the “Danner Action”)**

***MeehanCombs Global Credit Opportunities Master Fund, L.P. et al., v. Caesars Entertainment Corporation, et al.*, Case No. 1:14-cv-7091-SAS (the “MeehanCombs Action”)**

Dear Judge Scheindlin:

On behalf of the plaintiffs (collectively, the “Plaintiffs”) in the *BOKF*, *Danner*, and *MeehanCombs* Actions (collectively, the “Guarantee Actions”), we write to respond briefly to Defendant Caesars Entertainment Corp.’s (“CEC”) letter to the Court dated July 31, 2015. See *BOKF* ECF No. 48; *Danner* ECF No. 43; *MeehanCombs* ECF No. 50.

CEC’s letter confirms that all parties in the Guarantee Actions support an extension of the fact discovery deadline from August 31, 2015 to September 30, 2015. The requested extension will align the fact discovery deadlines in the four cases before Your Honor, and also the *WSFS* Action pending in Delaware Chancery Court, thereby permitting the full coordination of discovery in all of the Guarantee Actions. See *BOKF* ECF No. 49; *Danner* ECF No. 44; *MeehanCombs* ECF No. 51.

CEC’s letter raises several additional issues, however, that were not discussed in Plaintiffs’ original letter to the Court. Plaintiffs dispute many of CEC’s contentions (e.g., that Plaintiffs have refused to “coordinate” deposition discovery). However, because the issues

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raised by CEC are outside the scope of Plaintiffs' original request for an extension, Plaintiffs will not burden the Court with another lengthy communication regarding issues the Court need not address at this time. Plaintiffs hereby reserve their rights, and are prepared to address the substance of CEC's contentions at any conference or teleconference the Court may choose to schedule.

A proposed Order extending the deadline for the completion of fact discovery is included with this letter for the Court's convenience.

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Respectfully submitted,

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cc: All Counsel of Record (via ECF)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MEEHANCOMBS GLOBAL CREDIT
OPPORTUNITIES MASTER FUND, LP, *et al.*

Plaintiffs,

v.

CAESARS ENTERTAINMENT CORPORATION and
CAESARS ENTERTAINMENT OPERATING
COMPANY, INC.,

Defendants.

No. 14 Civ. 07091 (SAS)

**[PROPOSED]
ORDER**

FREDERICK BARTON DANNER, Individually and
on behalf of all others similarly situated,

Plaintiff,

v.

CAESARS ENTERTAINMENT CORPORATION and
CAESARS ENTERTAINMENT OPERATING
COMPANY, INC.,¹

Defendants.

No. 14 Civ. 07973 (SAS)

[Caption continued on next page]

¹ While the caption of this matter remains the same as in the Plaintiffs' original Complaints, Caesars Entertainment Operating Company ("CEOC") is not a party to this Amended Order as, pursuant to this Court's Order dated January 15, 2015 (D.I. 21), the Plaintiffs' Complaints against Defendant CEOC are stayed pursuant to Section 362(a) of Title 11 of the United States Code based on Chapter 11 petitions filed with respect to CEOC in both the United States Bankruptcy Courts for the District of Delaware and for the Northern District of Illinois. For the avoidance of doubt, and notwithstanding anything else stated herein, this order shall not apply to CEOC and *is not and should not be deemed an attempt to commence or continue an action against CEOC, to collect a debt against CEOC or take any other action in violation of the automatic stay imposed by Section 362 of Title 11 of the United States Code.*

BOKF, N.A. solely in its capacity as successor
Indenture Trustee for the 12.75% Second-Priority
Senior Secured Notes due 2018,

Plaintiff,

v.

CAESARS ENTERTAINMENT CORPORATION,

Defendant.

No. 15 Civ. 01561 (SAS)

On February 3, 2015, the Court issued a Scheduling Order [*MeehanCombs* ECF No. 34; *Danner* ECF No. 25] in the *MeehanCombs* and *Danner* Actions. On May 20, the Court held a Conference in the *MeehanCombs*, *Danner*, and *BOKF* Actions (collectively, the “Actions”), at which the Court ordered that the fact discovery deadline in the *MeehanCombs* and *Danner* Actions be extended thirty (30) days from August 1, 2015 to August 31, 2015, and the fact discovery deadline in the *BOKF* Action be set to August 31, 2015. The parties subsequently submitted a proposed Amended Scheduling Order, which the Court entered on June 2, 2105 [*MeehanCombs* ECF No. 44; *Danner* ECF No. 39; *BOKF* ECF No. 21]. The fact discovery cutoff in the Actions is currently August 31, 2015.

On July 31, counsel for the Plaintiffs submitted a letter to the Court in the Actions [*MeehanCombs* ECF No. 50; *Danner* ECF No. 43; *BOKF* ECF No. 48] seeking a thirty (30) day extension of the fact discovery deadline to and including September 30, 2015. Based on the statements in the Plaintiffs’ letter, and the response from Defendant Caesars Entertainment Corporation thereto, it is hereby

ORDERED, that the fact discovery cutoff in the Actions is extended from August 31, 2015 to and including September 30, 2015. Further extensions will be granted (with sufficient notice) if necessary.

SO ORDERED

Shira A. Scheindlin
U.S.D.J.

Dated: New York, New York
August __, 2015